

IN THE CIRCUIT COURT OF ATTALA COUNTY, MISSISSIPPI

CHARLENE GRAY

PLAINTIFF

VS

CAUSE NO. 17-0199-CV-L

WAL-MART STORES EAST, LP, and  
DOES ONE THROUGH FIVE

DEFENDANTS

COMPLAINT

COMES NOW Charlene Gray, plaintiff, by and through her attorney filing this her Complaint against Wal-Mart Stores East, LP, and Does One through Five, defendants herein, and in support thereof would respectfully show unto this Court the following facts, to-wit:

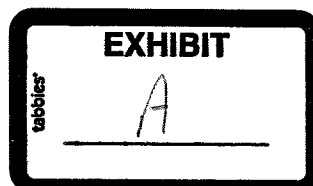
1. Plaintiff, Charlene Gray, is an adult resident citizen of Attala County, Mississippi.
2. Defendant, Wal-Mart Stores East, LP, is an Arkansas corporation with its principal place of business located in Bentonville, Arkansas. It's registered agent for service of process, CT Corporation System, may be found at 645 Lakeland East Drive, Suite 101, Flowood, Mississippi. Defendant Wal-Mart Stores East, LP, operates the Wal-Mart Store located in Attala County, at 220 Veterans Memorial Drive, Kosciusko, Mississippi, 39090. The plaintiff was an invitee at this location on the day of the incident in question.

3. Defendants, Does One Through Five, are fictitious and unknown parties who may be responsible parties whose negligent acts caused or contributed to the Plaintiff's injuries. The identity of this party or the identities of these parties are unknown at this time and can only be ascertained through the use of judicial mechanisms such as discovery. Upon learning the identity of this party or parties, the Plaintiff may substitute it/them for the fictitious parties under Rule 9(h). Alternatively, in the event that the Plaintiff has sued the wrong party and is required to change parties, such amendment will be made in accordance with Rule 15(c).

FILED  
Wanda Fancher, Circuit Clerk

NOV 15 2017

*Lula Morgan, Jr.*



4. This Court has jurisdiction and venue is proper as the events complained of occurred in Attala County, Mississippi.

5. On November 15, 2014, Charlene Gray was an invitee at the Wal-Mart Store located at 220 Veterans Memorial Drive, Kosciusko, Mississippi, 39090, when she slipped and fell due to a hazardous substance on the floor of said store.

6. Individual defendants, along with corporate defendants and their respective employees, including those responsible for maintenance and clean-up, were negligent in failing to fulfill their responsibilities created by their employment with Wal-Mart Stores East, LP, and Does One through Five. Corporate defendants Wal-Mart Stores East, LP, and Does One through Five are vicariously liable for any employee's individual and respective negligence, failure to maintain the premises in a reasonably safe condition, failure to warn of any unsafe condition, and otherwise negligent acts.

7. As a result of Wal-Mart Stores East, LP, and any corporate Does One through Five defendant, and their individual or respective employees' negligence and failure to maintain the premises in a reasonably safe condition, failure to warn of any unsafe condition, and otherwise negligent acts, Charlene Gray slipped and fell due to a hazardous substance on the floor of said store, and as a proximate result thereof suffered serious bodily injury and incurred substantial damages in an amount to be determined by the Court.

These damages include, but are not limited to the following:

- a. Past, present and future medical expenses;
- b. Past, present and future physical pain and suffering
- c. Past, present and future mental and emotional distress;
- d. Inconvenience and discomfort;
- e. Any and all costs of litigation;

f. Any other relief which the Court or jury deems just of appropriate based upon the circumstances.

**WHEREFORE, PREMISES CONSIDERED,** Plaintiff demands judgement against the Defendants, Wal-Mart Stores East, LP, and Does One through Five for actual and compensatory damages in an amount to be determined by the Court and any other relief which the Court deems just and appropriate.

Respectfully submitted,



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